



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Implement the)
Commission's Procurement Incentive Framework)
and to Examine the Integration of Greenhouse)
Gas Emissions Standards into Procurement)
Policies.)

R.06-04-009
(Filed April 13, 2006)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO
APPLICATIONS FOR REHEARING OF DECISION 07-01-039

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Dated: **March 13, 2007**

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I.

INTRODUCTION

Pursuant to Rule 16.1(d) of the Rules of Practice and Procedure (Rules)¹ of the California Public Utilities Commission (Commission), Southern California Edison (SCE) respectfully submits its response to applications for rehearing of Decision 07-01-039 (D.07-01-039 or Decision)² filed by the Energy Producers and Users Coalition and the Cogeneration Association of California (EPUC/CAC),³ and the Community Environmental Council (CE Council).⁴ EPUC/CAC's Application was the last application filed, so this response is due fifteen days after February 26, 2007, which is March 13, 2007, pursuant to Rule 16.1(d), which provides:

In instances of multiple applications for rehearing the response may be to all such applications, and may be filed 15 days after the last application for rehearing was filed.

¹ Title 22, Cal. Code Reg's.

² The Decision is dated January 25, 2007.

³ EPUC/CAC's "Application for Rehearing, or in the Alternative, Petition for Modification of the Energy Producers and Users Coalition and the Cogeneration Association of California" was filed on February 26, 2007. These two types of pleadings, however, have different procedural schedules and requirements, so the CPUC accepted the pleading as an application for rehearing only and not as an alternative petition for modification.

⁴ CE Council's Application was filed on February 22, 2007.

II.

THE COMMISSION SHOULD DENY EPUC/CAC'S APPLICATION FOR REHEARING SINCE IT IS NOT BASED ON LEGAL ERROR IN THE DECISION AND IS ONLY AN ATTEMPT TO REARGUE ISSUES

The Commission's Rules provide two ways to challenge a Commission decision after its adoption: (1) an application for a rehearing, and (2) a petition for modification. An application for rehearing is the appropriate way for a party to alert the Commission to an alleged legal error in the decision.⁵ In contrast, the Commission uses the petition for modification process in order to address new or changed facts that might affect the outcome of the decision or the Commission's interpretation of the decision.⁶ California Public Utilities Code (Cal PUC) section 1732 specifies the requirements that a party must include in an application for rehearing:

The application for a rehearing shall set forth specifically the ground or grounds on which the applicant considers the decision or order to be unlawful. No corporation or person shall in any court urge or rely on any ground not so set forth in the application. Cal PUC § 1732. Emphasis added

EPUC/CAC, however, fails to specify any ground or grounds upon which the Decision is unlawful. Rather, EPUC/CAC state in their section entitled "Introduction and Specification of Error":

The Decision should be revised to provide a rational and reasonable method for calculating the carbon emissions of a bottoming-cycle cogeneration plant. The Decision is based on the assumption that a bottoming-cycle plant has "useful thermal output." Unlike topping-cycle cogeneration plants which produce thermal energy and electricity, bottoming-cycle plants only produce an industrial commodity and electricity; they do not necessarily produce a useful thermal output in order to qualify as bottoming-cycle units. All of the energy input into the process is required for the production of the industrial commodity. From the production of that commodity, there is waste heat which the

⁵ D.02-09-020, *mimeo* at 3-4, citing former Rule 86.1, which new Rule 16.1 replaces.

⁶ *Id.*, citing former Rule 47(a), which new Rule 16.4 replaces.

cogeneration facility captures to generate electricity. There is generally no useful thermal energy output of a bottoming-cycle plant, and the formula for calculating emissions from a cogenerator does not work for bottoming-cycle units. Specifically, Findings of Fact 88, 90, 112 and 113 should be revised or deleted. EPUC/CAC's Application at pp. 1-2.

EPUC/CAC cite no legal error in the Commission's determination of the treatment for bottoming cycle cogeneration facilities. Instead, EPUC/CAC seek to reargue facts and policies that the Commission adopted in the Decision, in part based on proposals submitted by EPUC/CAC itself in its prior pleadings.⁷ A petition for modification, however, would be the appropriate vehicle to present new facts that could not have previously been raised before the Commission. EPUC/CAC could have previously raised its "new" facts before the Commission. Indeed, it did present facts about the manner in which to calculate net emissions from cogeneration plants, and the Decision adopted EPUC/CAC's proposal to include thermal output of cogeneration facilities. Now, EPUC/CAC wants to change its own proposal.

Under Rule 16.4, a petition for modification must concisely state the justification for the requested relief and must propose specific language to carry out all requested modifications to the decision. Any factual allegations must be supported with specific citations to the record in the proceeding or to matters that may be officially noticed. Allegations of new or changed facts must be supported by an appropriate declaration or affidavit. However, as the Commission will no doubt observe, there are no new or changed facts being presented by EPUC/CAC in the subject application. EPUC/CAC already raised the same issues earlier, and the Decision acknowledges the arguments of EPUC/CAC that the EPS should not be applied to bottoming-cycle cogeneration.

In addition, EPUC/CAC assert that the EPS cannot reasonably be applied to bottoming-cycle cogeneration... They request clarification that this technology is not included within the definition of "powerplants" under SB 1368. They argue that there

⁷ See Comments on Proposed Decision of the Energy Producers and Users Coalition and the Cogeneration Association of California, dated January 2, 2007, at pp. 10-14.

are no emissions associated with the generation of electricity using a bottom-cycle generator—emissions are instead associated with the underlying industrial process. EPUC/CAC propose that the entire emissions output of such facilities should be exempt from EPS, regardless of whether the electrical output is used for on-site needs or is sold under contract to an LSE. D.07-01-039, *mimeo* at 96.

Instead of adopting the exemption proposed by EPUC/CAC, the Decision applies the EPS to all cogeneration facilities, including bottoming-cycle:

We do not adopt these recommendations. SB 1368 meant the EPS to apply to all cogeneration facilities since it specifies a rule for calculating the emissions of cogeneration facilities. (See § 8341(d)(3).⁸) Had the Legislature intended to exempt gas-fired cogeneration from the EPS, it would have explicitly done so. This is clearly not the case.

We also find no basis in SB 1368 for EPUC/CAC’s assertion that bottoming-cycle cogeneration is not a powerplant. SB 1368 establishes that “powerplant” means “a facility for the generation of electricity” and bottom-cycling generation uses waste heat to generate electricity. In addition, SB 1368 does not distinguish between emissions from topping-cycle and emissions from bottoming-cycle cogeneration facilities. D.07-01-039, *mimeo* at 96. Footnote added.

EPUC/CAC supported the incorporation of a cogenerator’s total energy output when calculating the emissions rate in its Comments of EPUC/CAC on the Final Workshop Report.⁹ In those Comments, EPUC/CAC recommended:

The Commission should adopt the methodology proposed by EPUC/CAC and supported by the Workshop Report for the inclusion of thermal energy output in the calculation of a cogenerator’s emission rate. *Id.* at 16. Emphasis added.

⁸ Cal Pub Util Code 8341(d)(3) provides:

The commission shall establish an output-based methodology to ensure that the calculation of emissions of greenhouse gases for cogeneration recognizes the total usable energy output of the process, and includes all greenhouse gases emitted by the facility in the production of both electrical and thermal energy.

⁹ EPUC/CAC Comments on Final Workshop Report, pp. 3-5.

In fact, EPUC/CAC recognizes this in the following quote:

EPUC/CAC appreciate the adoption by the PD of the methodology proposed by EPUC/CAC, and the recognition by the Commission of FERC’s definition of “useful thermal energy.” EPUC/CAC Comments on PD, p. 12. Emphasis added.

The Commission should reject EPUC/CAC’s Application because it cites no legal error and also should reject EPUC/CAC’s late efforts to overturn its own proposal adopted by the Decision.

III.

THE COMMISSION SHOULD DENY CE COUNCIL’S APPLICATION FOR REHEARING BECAUSE IT IS NOT BASED ON ANY LEGAL ERROR IN THE DECISION.

The CE Council claims that the Commission committed legal error by not considering Cal PUC section 8341(d)(2):

In determining the rate of emissions of greenhouse gases for baseload generation, the commission shall include the net emissions resulting from the production of electricity by the baseload generation... Cal PUC section 8341(d)(2). Emphasis added.

The CE Council equates the phrase “net emissions” with “net (lifecycle) emissions” and concludes that the commission should consider net lifecycle emissions of all baseload generation. “Net emissions” do not equate to “lifecycle emissions,” as the CE Council suggests. The purpose of SB 1368 is to capture the carbon emissions of production of electricity. It provides no guidance on the manner in which to calculate a “lifecycle” that results in such electricity production. SB 1368 does not even use the term coined by the CE Council – “net lifecycle emission.” Rather, the law considers only “net emissions.” The only provision that conceptually resembles a “lifecycle” analysis is Cal PUC section 8341(d)(4), which addresses biomass, biogas, and landfill gas energy-based electricity production:

In calculating the emissions of greenhouse gases by facilities generating electricity from biomass, biogas, or landfill gas energy,

the commission shall consider net emissions from the process of growing, processing, and generating the electricity from the fuel source. Cal PUC section 8341(d)(4). Emphasis added.

In this provision, SB 1368 instructs the Commission to include net emissions from the process of growing the biological material or processing such material when considering the net emissions resulting from the generation of electricity from those fuel sources. That might be considered a type of “lifecycle” analysis. The biomass, biogas, and landfill gas provision in the statute in fact demonstrates that the Legislature knew how to describe a “lifecycle” form of analysis and did so when it wanted to direct the Commission to perform one. The statute, however, provides no direction to perform any sort of “lifecycle” analysis when it comes to determining the net emissions of other types of “baseload generation.” Moreover, the CE Council provides no cogent description of what such “lifecycle” analyses might include. Without direction by the legislature, the Commission cannot conduct a “net lifecycle emissions” analysis. The Commission’s efforts are properly directed at implementing the existing legislation and not to legislate by rulemaking.

The CE Council also proposes that the Commission should adapt the Energy Commission’s research pursuant to AB 1007 on a lifecycle/net emissions analysis for transportation sector and use it for producing the net lifecycle emissions for all baseload generation. The CE Council provides no rationale for this proposal.

The Commission’s Rule 16.1(c) identifies the requirements that a party must include in any application for rehearing:

Applications for rehearing shall set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous, and must make specific references to the record or law. The purpose of an application for rehearing is to alert the Commission to a legal error, so that the Commission may correct it expeditiously. Rule 16.1(c). Emphasis added.

The CE Council has failed to identify any provision in SB 1368 that requires a “lifecycle” analysis of all baseload generation. The CE Council addressed this same issue in its Opening

Comments on the PD when it urged the Commission to include in the Decision a preliminary life cycle analysis of net carbon emissions for natural gas plants that use liquefied natural gas (LNG). CE Council's focus on "upstream carbon emissions" in the "net carbon emissions" calculation ignores the "downstream carbon emissions," such as those that would be associated with a project that uses oil field injection for CO₂ for example. "Net carbon emissions" for such a project could mean power plant emissions minus the CO₂ injected into geologic formations. In this case, the "net carbon emissions" calculation would be performed after the CO₂ is created by whatever electric generation process is used – not before the electric generation when the fuel is created or transported to the plant. The Decision thoroughly addresses the CE Council's concerns:

Finally, in its opening comments on the Proposed Decision, the Community Environmental Council (CE Council) urges us to include in today's decision a preliminary "lifecycle" analysis of net emissions for natural gas plants that may use liquefied natural gas (LNG), and to indicate that the EPS will be modified in the future in accordance with the Commission's findings regarding GHG emissions from LNG. A definition of "lifecycle analysis" (including where the lifecycle begins and ends) is not presented in CE Council's comments. ... However, in the context of LNG, CE Council describes such an analysis as including the upstream carbon emissions associated with the extracting and shipping of LNG in addition to those resulting from the production of electricity at the natural gas plant.

The scoping of Phase 1 did not identify the issue that CE Council now raises in its comments on the Proposed Decision, namely, whether the Commission should undertake a lifecycle net emissions analysis to determine compliance with SB 1368, and if so, how that analysis should be conducted. Moreover, SB 1368 specifically directs us to consider lifecycle net emissions in one context only, and not in others, and we have followed that specific direction (e.g., for biomass, biogas or landfill gas-fueled plants where CO₂ is removed from the atmosphere at one lifecycle stage and put into the atmosphere at another). If we were to go beyond that specific direction and take a lifecycle approach to other net emission calculations, we would have to do so for all other resources to treat them consistently--and not just for LNG as CE Council suggests. Taking such an approach was not raised during the scoping of Phase 1, during workshops or in pre- or post-

workshop written comments. Even if it were, we do not have a sufficient record or time before the statute requires us to adopt an enforceable standard to take this approach for the interim EPS. For these reasons, we do not adopt CE Council's recommendation. Decision at pp. 185-186.

The Decision provides a logical and lawful rationale for denying CE Council's proposed net lifecycle emissions analyses for all baseload generation. The Commission committed no legal error in its rationale. Thus, the Commission should deny the CE Council's Application for Rehearing because it fails to satisfy the statutory requirements for rehearing. The CE Council has provided no additional legal basis or argument to justify its proposed changes to the Decision.

IV.

CONCLUSION

For the reasons stated in this Response, SCE respectfully requests that the Commission deny EPUC/CAC's and CE Council's Applications for Rehearing of D.07-01-039.

Respectfully submitted,

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March 13, 2007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY's (U 338-E) RESPONSE TO APPLICATIONS FOR REHEARING OF DECISION 07-01-039 on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **13th day of March, 2007**, at Rosemead, California.

/S/ RAQUEL IPPOLITI

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